# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA COLUMBIA DIVISION

IN RE: BLACKBAUD, INC. CUSTOMER DATA SECURITY BREACH LITIGATION

Case No. 3:20-mn-02972-JMC

**MDL No. 2972** 

# **MOTION TO SEAL**

COME NOW the Plaintiffs, by and the through the undersigned counsel, and, as detailed more fully in the accompanying memorandum provided as per Local Civil Rule 7.04, hereby move pursuant to Local Civil Rule 5.03 to seal the revised Consolidated Amended Complaint, which contains confidential information within the scope of the March 29, 2021 Stipulated Confidentiality Order entered in this matter (ECF No. 63).

Dated this 21st day of December, 2021 Respectfully submitted,

/s/ Marlon E. Kimpson

Marlon E. Kimpson (SC Bar No. 17042)\*

# **MOTLEY RICE LLC**

28 Bridgeside Boulevard Mount Pleasant, SC 29464

Tel.: (843) 216-9000 Fax: (843) 216-9027

Email: mkimpson@motleyrice.com

Amy E. Keller\*

#### DICELLO LEVITT GUTZLER LLC

Ten North Dearborn Street, Sixth Floor

Chicago, IL 60602 Tel: (312) 214-7900

Fax: (312) 253-1443

Email: akeller@dicellolevitt.com

Krysta Kauble Pachman\*

SUSMAN GODFREY LLP

1900 Avenue of the Stars, Suite 1400

Los Angeles, CA 90067

Tel: (310) 789-3100 Fax: (310) 789-3150

Email: kpachman@susmangodfrey.com

#### Harper Segui\*

#### WHITFIELD BRYSON LLP

Federal ID No. 10841 217 Lucas Street, Suite G Mount Pleasant, SC 29464

Tel: (919) 600-5000 Fax: (919) 600-5035

Email: harper@whitfieldbryson.com

# \*Plaintiffs' Co-Lead Counsel

Gretchen Freeman Cappio\*\*

#### KELLER ROHRBACK L.L.P.

1201 Third Avenue, Suite 3200

Seattle, WA 98101 Tel.: (206) 623-1900 Fax: (206) 623-3384

Email: gcappio@kellerrohrback.com

# \*\*Chair of Plaintiffs' Steering Committee

#### **Desiree Cummings**

#### **ROBBINS GELLER RUDMAN & DOWD LLP**

420 Lexington Avenue, Suite 1832

New York, NY 10170 Tel: (212) 693-1058

Email: dcummings@rgrdlaw.com

#### Melissa Emert

# KANTROWITZ, GOLDHAMMER & GRAIFMAN, PC

747 Chestnut Ridge Road Chestnut Ridge, NY 10977

Tel: (866) 574-4682 Fax: (845) 356-4335

Email: memert@kgglaw.com

#### Kelly Iverson

#### LYNCH CARPENTER LLP

1133 Penn Avenue, 5th Floor Pittsburgh, PA 15222

Tel: (412) 322-9243

Fax: (412) 231-0246 Email: kelly@lcllp.com

# Howard Longman

# **LONGMAN LAW PC**

354 Eisenhower Parkway Livingston, NJ 07039 Tel: (973) 994-2315

Tel: (9/3) 994-2315 Fax: (973) 994-2319

Email: longmanlawpc@gmail.com

# Douglas McNamara

# COHEN MILSTEIN SELLERS & TOLL PLLC

1100 New York Avenue NW East Tower, 5th Floor Washington, DC 20005

Tel: (202) 408-4600 Fax: (202) 408-4699

Email: dmcnamara@cohenmilstein.com

#### Melissa Weiner

# PEARSON, SIMON & WARSHAW, LLP

800 LaSalle Avenue, Suite 2150

Minneapolis, MN 55402

Tel: (612) 389-0600 Fax: (612) 389-0610

Email: mweiner@pswlaw.com

# Plaintiffs' Steering Committee

Frank Ulmer McCulley McCluer LLC 701 East Bay Street, Suite 411 Charleston, SC 29403

Tel: (843) 444-5404 Fax: (843) 444-5408

Email: fulmer@mcculleymccluer.com

#### Plaintiffs' Liaison Counsel

# **CERTIFICATE OF SERVICE**

I hereby certify that on December 21, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

/s/ Marlon E. Kimpson

Marlon E. Kimpson (SC Bar No. 17042)\* **MOTLEY RICE LLC** 

28 Bridgeside Boulevard Mount Pleasant, SC 29464

Tel.: (843) 216-9000 Fax: (843) 216-9027

Email: mkimpson@motleyrice.com